



Madera Regional Water Management Group
Lead Agency: Madera Irrigation District
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April 4, 2016

California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236
Attn: Craig Cross

Regarding: Comments on the Draft 2016 IRWM Guidelines, Draft Planning Proposal Solicitation Package, and Draft Disadvantaged Community Involvement

Dear Craig Cross,

Thank you for the opportunity to provide comments to the Draft 2016 IRWM Guidelines, Draft Planning Proposal Solicitation Package, and Draft Disadvantaged Community Involvement (DAC). These comments on the draft RFP are submitted on behalf of the Madera Regional Water Management Group:

- DAC RFP – VII. Reporting Requirements; first sentence
The first sentence reads, “Funds will not be disbursed until there is and executed grant agreement between DWR and the Grantee.” By this statement, it is presumed that in the Mountain Counties Funding Area, DWR would disperse \$1.3 million to the grantee once there is an executed agreement. However, in the Grant Program Guidelines, page 16; Eligible Costs and Payment, *Reimbursement*, the statement reads that “DWR’s standard method of reimbursement is arrears, which seems to conflict with the language in the DAC RFP.
Further, in the following *Advanced Payment* section, DWR would allow for a 50 percent advanced payment for certain projects, such as this DAC RFP, provided that the award is less than \$1,000,000 in grant funds. So it appears by this language in this section that the Mountain Counties Funding Area would not be able to receive an advanced payment as the grant award is \$1,300,000.
- Baseline Funding or Funding of an individual is needed– Regional Project Manager
In a Regions such as ours that is split in to two very large Regions, we will need a full-time employee to travel the very large Region of the Mountain Counties as well as the other large Region of the San Joaquin River Valley. How will groups, like ours fund an individual to drive to Funding Area Meetings, work with the other Regions, and assist in completing a viable plan as well as projects associated with the plan. Other expenses for

travel, mileage, meeting supplies, etc. will also be required to achieve successful outreach and collaboration with the other regions of the funding areas as well as the Outreach/educational efforts to the DACs in the regions.

- DAC RFP – Section IV – ELIGIBLE COSTS; first sentence
Grantees are encouraged to limit direct administrative costs to no more than 5 percent of the total grant share amount. By raising the administrative percentage to 10% or 15% and broadening the definition, these funds could possibly be used to cover the “Regional Project Manager” of each individual Region within the larger Funding Area.
- DAC RFP – V. PROPOSAL PROCESS; third paragraph
Comment: “The Applicant will act as a single point of contact and will work with DWR, DAC’s.....”
Each Funding Area will require assistance directly provided by DWR with requirements of and a process to choose a viable and appropriate representative for the entire Funding Area. This will be a difficult process and decision because the DAC Outreach Funding is the ONLY Funding that is non-competitive and REQUIRES all regions to work together. All other funding offered in Proposition 1 (and all previous Propositions) have required all Regions to compete against each other. This changes the mind-set and goes directly against all other processes thus assistance and clarification will be required from DWR throughout this process.
- DAC RFP – VII. Reporting Requirements; first sentence
The first sentence reads, “Funds will not be disbursed until there is an executed grant agreement between DWR and the Grantee.” By this statement for example, it is presumed that in the Mountain Counties Funding Area, DWR would disperse \$1.3 million to the grantee once there is an executed agreement. However, in the Grant Program Guidelines, page 16; Eligible Costs and Payment, *Reimbursement*, the statement reads that “DWR’s standard method of reimbursement is arrears, which seems to conflict with the language in the DAC RFP.

Further, in the following *Advanced Payment* section, DWR would allow for a 50 percent advanced payment for certain projects, such as this DAC RFP, provided that the award is less than \$1,000,000 in grant funds. So it appears by this language in this section that the Mountain Counties Funding Area would not be able to receive an advanced payment as the grant award is \$1,300,000.

- Proposition 1 Standard Changes
By changing the Standards again, it would appear that the Regions who have had an IRWM Plan from the first Round (Proposition 59, then Proposition 84) are being penalized for having a plan from the beginning by having to constantly upgrade it. Each time the Proposition changes, therefore the Legislature changes the Standards, there is another large cost to upgrade the IRWM Plan before the Region has the ability to apply for Implementation Funds. Planning funds also need to be made available for Updates as well as new IRWM Plans that are finally just being written.

Please clarify the following questions as to the applicability to both Funding Areas of our Region:

- Question: What about the IRWM Regions, ie Madera, who are cut in half and have to represent and work in two different funding areas? Going through the process once is difficult and costly enough; having to complete this process twice without a designated and funded Project Manager will be improbable.
- Question: It is understood that the Disadvantage Community Involvement grant program timeline is two years from the executed agreement. Please explain if DWR would provide flexibility on the two-year commitment depending on progress of the program? Especially for Regions who have more than one funding area.
- Question: Are you expecting only one proposal from each funding area and if you receive more than one, how will you choose who to award the grant agreement to?
- Question: Are you expecting only one group to apply to be the "Applicant" or the "Fiscal Agent" in each funding area? If you receive more than one will DWR decide or is it up to the Funding Area to come to a consensus?
- Question: How will you handle a situation where there is not 100% agreement or 100% participation in a proposal? Will you execute an agreement with the IRWMs that are willing to participate and withhold a portion of the funding for any IRWM(s) that don't engage? Or will you withhold funding from the entire funding area unless all IRWMs are participating in one proposal?
- Question: If funds from the Disadvantaged Community Involvement grant program are not used, will DWR reallocate the remaining funds to the DAC Implementation Grant Program?

Thank you for this opportunity. If you have any questions, please contact us directly.
Sincerely,



Carl Janzen
Chairperson
Madera Regional Water Management Group